

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 99-271

REQUEST: Department of Telecommunications and Energy's First Set of Information Requests to AT&T Communications of New England, Inc.

DATED: August 10, 2000

DTE-ATT 1-1: [Checklist item # 1] Please provide the supporting documentation for AT&T's trunking requests to BA-MA with respect to the South Boston facility mentioned on page 41 of AT&T's supplemental comments. Specifically, please provide a copy of the forecast(s) provided to BA-MA, the ASRs, and documents indicating whether AT&T or BA-MA requested new due dates. According to AT&T's response to record request 234, AT&T does not track supplements, dates when FOCs are received back from BA-MA, nor CNR designations. However, if AT&T does have any of this information for the South Boston facility, please provide it.

Respondent: Brian Huntley

REPLY: Attached are a copy of the AT&T forecast provided to BA in October 1999 and supporting documentation for AT&T's trunking requests to BA-MA with respect to the South Boston facility.

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DTE-ATT 1-2: [Checklist item # 1] According to AT&T, in March 2000, BA-MA "arbitrarily changed its due dates" 18 times for seven separate orders because BA-MA was not ready to test trunks (AT&T Supplemental Comments at 43). Please provide the supporting documentation for this assertion. In addition, please provide the underlying documentation supporting AT&T's claim that BA-MA missed trunking dates for 25 percent and 32 percent of AT&T's total trunking orders for April and May, 2000, respectively (id.).

Respondent: Brian Huntley

REPLY: The following are a synopsis of orders placed by Bell Atlantic, CLEC3 orders, and orders placed by AT&T Local Services, ALS. The log entries depict attempts to escalate orders for T1 facilities and their associated traffic trunks in the various ALS switches in Massachusetts. The orders are from the March through May 2000 period. ALS has attempted to meet "Due Dates" only to be inhibited by Bell Atlantic's lack of responsiveness to meet their original commitments. On many occasions Bell will request service from ALS. ALS will engineer and commit equipment as well as personnel to accomplish Bell's "Due Date" request only to find that Bell has not issued orders due to lack of facilities or just code their orders as "CO1", customer not ready, when they, Bell Atlantic has ordered service.

March 2000

ALS order #BOSP9909976, 9977: Bell Atlantic PON# TPM-QNCYMAHA

The original "Due Date" was December 13, 1999. This is a "CLEC3 order, ordered by Bell Atlantic. On Dec. 15th Bell Atlantic told ALS that Bell Atlantic has not issued their order yet. On Jan. 12th ALS informed Bell Atlantic that ALS was ready to test. January 18th, Bell Atlantic still has not issued orders. Bell Atlantic changed due date on Jan. 25th to

March 1st. On February 17th, Bell Atlantic Technician called for ALS status and order #s and was told that ALS is ready to test the T1 facility. On March 1st ALS was told that Bell was not ready to turn up trunks associated with AQ105468. On March 8th the trunks were turned up for service. CLEC3 order.

ALS order #BOSP0000353: Bell Atlantic PON# TPM-WPBDMAPI

Bell Atlantic changed due date 3 times because they were not ready to test their T1 facility. This is a CLEC3 order. Original due date February 9, 2000.

ALS order #BOSP10424, 10426: Bell Atlantic PON# TPM-NATLMAOE

Bell Atlantic changed due date 3 times because they, Bell Atlantic, was not ready. Original due date, December 21, 1999. CLEC3 order.

ALS order #BOSP9909890, 9891: Bell Atlantic PON# NYX-MNFD

Bell Atlantic changed due date 3 times because they, Bell Atlantic, was not ready. The original due date was December 6, 1999. CLEC3 order.

ALS order #BOSP0000494, 495, 496: Bell Atlantic PON#
ATT199932117

Bell Atlantic changed due date 3 times, because they, Bell Atlantic, was not ready to test. The original due date was February 22, 2000. CLEC3 order.

ALS order # BOSP0000933: Bell Atlantic PON #AQ108335

Bell Atlantic changed due date 3 times because they, Bell Atlantic, was not ready to test. The original due date was February 22, 2000. CLEC3 order.

ALS order # BOSP0000944 through 950: Bell Atlantic PON
#ATT20002101

Bell Atlantic changed their due date because they, Bell Atlantic, was not ready to test on the original due date. The original due date was February 29, 2000. CLEC3 order.

ALS order # BOSP0000812 through 818: Bell Atlantic PON
#ATT20001101

Bell Atlantic changed due date 2 times because they, Bell Atlantic, was not ready to test facility on the original due date. The original due date was February 25, 2000. CLEC3 order.

The total orders for March 2000 were 161, of which 25 missed orders were due to Bell Atlantic, or 15% of the total orders for March.

The documents attached as Exhibit A reflect these problems it experienced in March 2000.

April

ALS order # BOSP9910427 through 10434: Bell Atlantic PON #TPM-NBPTMAGR

Bell Atlantic changed due date 5 times because they, Bell Atlantic, was not ready to test T1 facility. ALS was ready to test on December 16, 2000. Bell Atlantic had not issued orders until April, 2000. Bell was ready to test on April 13, 2000. The original due date was December 21, 1999. This is a CLEC3 order.

There was a total of 32 orders for April. Bell Atlantic was not ready to meet due date testing for 8 orders or 25% of the April total.

The documents attached as Exhibit B reflect the April 2000 experience.

May

ALS order # BOSP0000497 through 503: Bell Atlantic PON #ATT199932117

ALS was ready to test to T1 facility on February 8, 2000. Bell Atlantic was not ready to turn up service until May 5, 2000. Bell Atlantic changed their due date 5 times because they were not ready to test. The original due date was February 22, 2000. This is a CLEC3 order.

ALS order # BOSP0002364 and 2365: Bell Atlantic Switch Order #AQ104963

Bell Atlantic did not have any digital facilities in the Cambridge 4ESS, (CMBRMA0118T)

ALS was experiencing blockage and needed the facilities to complete traffic. ALS had to suggest to Bell Atlantic to disconnect an underutilized trunk group to free facilities. Original due date was April 23, 2000.

Service was turned up on May 30, 2000. This is a CLEC2 order, ALS originated traffic.

There were a total of 28 orders due for May. Bell Atlantic caused ALS to miss 9 orders or 32% of the total orders.

The documents attached as Exhibit C reflect the May 2000 experience.

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DTE-ATT 1-3: [Checklist item # 1] Please provide documentation supporting AT&T's claim that the 'vast majority' of changes or supplementals are due to missed due dates by BA-MA (AT&T Supplemental Comments at 44). In addition, please provide the documentation demonstrating that AT&T was ready to accept every trunk order outlined in AT&T's initial and supplemental comments on the initial due date, and that AT&T actively pursued BA-MA to complete each order or issue the FOC (id.).

Respondent: Brian Huntley

REPLY: See documentation produced in response to question 2, as well as the additional documents attached to this response.

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DATED: July 27, 2000

DTE-ATT 1-4: [Checklist item # 2] See AT&T Supplemental Comments at pp. 16, 19-23: Provide the Department with the documented results of AT&T's production testing in Massachusetts. In these results, show support for AT&T's claims that:

- a) "AT&T has encountered continuing problems . . . with notices either never being received or being received late" (p. 19)
- b) "As AT&T sent higher volumes of orders in June, . . . BA's OSS performance with respect to timely notices deteriorated" (p. 20)
- c) "AT&T did not receive an acknowledgment from BA-MA for more than 5% of the orders sent during the high volume week of production testing" (p. 20)
- d) "only 66% of the orders that should have received a Confirmation actually received them within 24 hours during the highest volume week of testing" (p. 21)
- e) "Only 54% of the provisioning completion notices received by AT&T. . . were on time" and "only 91% of all AT&T orders. . . that were eligible to be completed actually ever received either a provisioning or billing completion notice at all" (p. 22)
- f) "Many of AT&T's test orders were improperly rejected by the TISOC" and "over 50 percent of these were due to errors of TISOC personnel" (p. 23)

Respondent: William Carmody

REPLY:

(a) The following data from AT&T's Massachusetts production testing demonstrates the continuing problems with missing or late notices from Bell Atlantic. This data reflects orders submitted by AT&T during the week of June 11, 2000. Backup for this summary data, by PON, can be found in the attachment labelled **DTE-ATT 1-4.a**.

	<u>Orders</u>	<u>Percent</u>
Total One-Week Order Volume	949	
Total Acknowledgments (997s) Received	949	100%
Late 997s	49	5.2%
Total LSRCs Received from BA	624	65.8%
Late LSRCs	213	34.1% [= 213/624]
SEMs Received from BA	112	11.8%
Missing LSRC/SEM	213	22.4%
SUM: Total w/ Late or Missing Responses	475	50.1%

(b) Please see the attachment labeled **DTE-ATT 1-4.b**, which provides data from AT&T's production testing showing that as AT&T sent higher volumes of orders in June, BA's OSS performance with respect to timely notices deteriorated.

(c) The statement at page 20 of AT&T's supplemental comments should have read as follows: "AT&T did not receive a **timely** acknowledgment from BA-MA for more than 5% of the orders sent during the high volume week of production testing." The data provided under paragraph (a) of the response, above, shows that during the week of June 11 5.2 percent of acknowledgments by Bell Atlantic were late. See also attachment **DTE-ATT 1-4.b**.

(d) This statement is actually very generous to Bell Atlantic. It is based on the fact that, during the highest volume week of AT&T's production testing, only 411 of the total 624 LSRCs – or 65.9% of all LSRCs – were received on time. But an additional 213 orders never received any

response. Of the 949 total orders, only 112 were rejected via a Bell Atlantic SEM, meaning that the other 837 should have received a Confirmation. Measured against this number, the 411 on-time LSRCs represent only 49.1% -- not 66% -- of all orders that should have received a Confirmation. See the data provide in response to paragraph (a), above, including **DTE-ATT 1-4.b**.

(e) The following data from AT&T's Massachusetts production testing demonstrates that during the high volume week only 54 percent of the provisioning completion notices (PCNs) received by AT&T were on time, and only 91 percent of all AT&T orders that were eligible to be completed actually ever received either a provisioning or billing completion notice at all. This data also shows that fully 8.0 percent of the orders never received either a PCN or a billing completion notice (BCN). Please see attachment **DTE-ATT 1-4.e** for a detailed listing, by PON, of the information summarized below.

	<u>Orders</u>	<u>Percent</u>
Total Orders Eligible to Complete	625	
PCNs Not Received on Time	236	37.8%
No PCN Received At All	<u>54</u>	<u>8.6%</u>
Subtotal: No or Late PCN	290	46.4%
Remainder, Timely PCNs	335	53.6%
Received PCN, no BCN	24	3.8%
Received BCN, no PCN	6	1.0%
Received both PCN and BCN	<u>545</u>	<u>87.2%</u>
Subtotal: at least one completion	575	92.0%
Remainder, No Completions Rec'd	50	8.0%
Received PCN	571	91.4%
Received BCN	552	88.3%

(f) Once again, this statement is unduly generous to Bell Atlantic. During AT&T's Massachusetts production testing, Bell Atlantic erroneously rejected 189 orders that should have been accepted and confirmed. Of this 189 mistaken rejects, 138 – or 73 percent – were due to TISOC errors. Please see attachment **DTE-ATT 1-4.f** for a listing of the incorrectly rejected PONs, and identification of those rejects that were due to TISOC errors.

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DTE-ATT 1-5: [Checklist item # 2] Please refer to page 18 of the AT&T Supplemental Comments. Provide documentation supporting the claim that "AT&T continually experiences time-outs when trying to access BA's pre-order system." Include in this supporting documentation evidence that Bell Atlantic has responded to reported troubles by "re-boot[ing] or 'bounc[ing]' their servers."

Respondent: William Carmody

REPLY: Please see attachment **DTE-ATT 1-5**, which contains data showing that there are continuing problems accessing BA Pre-order information. The attachment consists of a spreadsheet showing the amount of times that AT&T has experienced either a Time-out error or a BA Communication Failure. As noted on many of the resulting trouble tickets, BA rarely identifies a root cause for these problems. Some of the tickets have information about BA "recycling" or "bouncing" their application servers as noted in AT&T's comments. These problems have been going on for most of this year and seem to be more frequent in recent months.

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DTE-ATT 1-6: [Checklist item # 2] Please refer to pages 23-24 of the AT&T Supplemental Comments. Provide evidence to support AT&T's claim that "instead of confirming the cancelled order, BA has issued a completion notice against the cancelled order in almost every case."

Respondent: William Carmody

REPLY: As AT&T stated in its Supplemental Comments (at 23), "When BA-MA receives a cancellation request from a CLEC, it is supposed to generate a confirmation that advises the CLEC that BA is processing the cancellation of the order. Under BA-MA business rules, no completion notice is supposed to be issued on such orders."

During AT&T's Massachusetts production testing, 387 orders were submitted as supplements to cancel a previous order. 125 of these were rejected, and another 155 received no response.

Out of the 107 of these supplements that received some response, all 107 improperly received either a provisioning completion notice (PCN), billing completion notice (BCN), or both. These 107 PONs are listed on the last three pages of attachment **DTE-ATT 1-6**.

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DTE-ATT 1-7: [Checklist item # 2] Please refer to page 24 of the AT&T Supplemental Comments. Provide supporting evidence for AT&T's claims that Loss of Line reports are inaccurate. Include in this support specific examples of the problems cited by AT&T in its comments.

Respondent: William Carmody

REPLY: AT&T's continued problems with BA's Loss of Lines report includes the omission of customers who have left AT&T but have not appeared on BA's report. This has caused AT&T to continue billing customers after they have left AT&T. See attachment **DTE-ATT 1-7 – Exhibit 1** for a list of the telephone numbers of 3,486 customers who have notified AT&T that they have switched carriers but have not appeared on the BA Loss of Line report.

AT&T is also receiving erroneous notification via Loss of Line reports of customers whom BA believes have left AT&T, when in fact they have not. AT&T will issue orders to stop billing these customers based on the report only to find out from the customer that they never left AT&T. AT&T must issue new orders to migrate the customer back, which BA rejects because the customer is still with AT&T according to their records. See attachment **DTE-ATT 1-7 – Exhibit 2** for a list of the telephone numbers of 256 customers who have experienced this problem.

DTE-ATT 1-7 – Exhibits 1 & 2 contain highly proprietary and confidential AT&T customer information and will therefore be provided only to the Department subject to appropriate protective treatment.

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DTE-ATT 1-8: [Checklist item # 2] Please refer to page 25 of the AT&T Supplemental Comments. AT&T discusses a late change to the business rules which was not announced until a "day after it was put into the production release." Please provide complete documentation concerning this change and its effect on AT&T's operations, including copies of all correspondence between AT&T and BA-MA.

Respondent: William Carmody

REPLY: AT&T conducted testing in the BA CTE test environment in preparation for the June 18th LSOG4 release. After two weeks of connectivity problems AT&T's Consumer Production Test was finally able to begin sending test transactions to BA on 5/30/00. On 6/5/00 the team notified BA that orders for BA South states were failing due to the presence of the Account Telephone Number(ATN) field. Orders for BA North (NY and MA) were not being rejected for this reason. See **DTE-ATT 1-8 – Exhibit 1** for correspondence between AT&T and BA. The correspondence from Damon Knight on 6/5/00 to Bill Carmody contains the BA Business Rules for population of this field on Platform orders that was in effect for the June release testing. The Business Rules state that this field was required under certain conditions or otherwise optional. AT&T had been sending this field at all times because there was no restriction that would cause a reject under the Business Rules.

The test team was expecting an official Change Control notice to advise of the change before changing the AT&T coding for the business rules for this field, as noted in the email from Joanne Thetga of BA. Apparently, on 6/14/00 BA made a change in their test environment that enforced the edit that would reject the presence of the ATN field when it was not **required** under the Business Rules.

On Friday, 6/16/00, AT&T had still not received Change Control notice that the Business Rules had changed and this was the last day of CTE

testing available. AT&T sent the following orders that were in violation of these the supposed changed Business Rules. See **DTE-ATT 1-8 -- Exhibit 2** for the actual BA status notices that were received. The orders were rejected, then confirmed and finally completed by BA even though they were in violation of the newly changed Business Rules. Due to the completion of these orders, and the lack of Change Control notice to the contrary, the AT&T test team believed that the ATN change was not in effect for BA North orders.

Early in the morning on Monday 6/19/00, AT&T discovered that most of AT&T's orders were being rejected by BA for using the ATN field when not required. After contacting BA it was learned that the ATN Business Rules had been changed and this was the reason for the rejects. BA released a Change Control notice later on Monday to confirm the change. See **DTE-ATT 1-8 -- Exhibit 3**. This notice should have been issued as soon as BA knew that the change was going to be instituted back in early June.

AT&T had to escalate to BA upper management and to the NY PSC to get this change reversed. BA relaxed the edit later in the evening on 6/19/00. AT&T by that time had a backlog of orders totaling approximately 8,000, from Saturday, Sunday and Monday June 17-19. AT&T spent the next few days managing the volume of orders to clear this backlog in a manner that would not overburden BA's order systems. AT&T estimates that this additional work has cost \$25,000 in additional costs to gauge the amount of orders sent to BA. AT&T has also experienced rejections due to delays in processing these orders in BA that invalidated the customer requested due dates.

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DTE-ATT 1-9: [Checklist item # 2] Please refer to page 26 of the AT&T Supplemental Comments. Provide supporting evidence for the claim that "CLEC Type 5 requests are typically scheduled as tentative for an upcoming release and then mysteriously fall of the list for that release when the specifications are provided."

Respondent: William Carmody

REPLY: AT&T believes that the following listing represents most of the Type 5 CRs that have been listed as tentatively scheduled but have later been delayed by BA without consultation with the CLECs.

CR561 Fielded Completions: Promised by BA in NY Collaboratives for 11/8/98 release. In December of '98, BA indicated that Phase I of Fielded Completions was scheduled for 3/20/99. April '99 minutes indicated that something will be implemented in the July/Aug. timeframe. On June 15, 1999, BA indicates that Phase IA will be scheduled for August and that Phase II would be scheduled for Dec. '99. As of October 12th, the entire release was moved to June 2000. On November 9, 1999, NY PUC ordered that this be implemented in April 2000. At the April Change Control Meeting, Fielded Completions had been dropped from the April release list. At the May 2000 meeting, BA indicated that the new release date was June 2000.

CR555 - Electronic Jeopardy Notification: Submitted to BA on 1/28/99, accepted by BA on 2/3/99. Throughout all of 1999, BA dragged their feet and provided very little information with regard to this CR with the exception of some preliminary requirements, this, in spite of the fact that requirements were submitted with the CR. January 2000 change control meeting indicated that the CR was being targeted for June 2000. March Change Control minutes have this on the release list for June 2000. April 2000 meeting, CR is dropped from June list. July meeting, BA indicates that they would like to implement in phases with Phase I in August and

full functionality in October 2000. CLEC community indicates that they would prefer to wait for full functionality in October since BA had indicated that any August release would not be deployed to the test environment prior to the release.

Access to Web GUI Through the Internet: This CR was originally scheduled for the March '99 release and then deferred on a tentative basis to the April '99 release. It was then moved to the June '99 release. Implementation was deferred from June 19th to June 28th and the July minutes then show it scheduled for July '99.

Stand Along CRIS Loop Bills: This CR had a tentative implementation of April, 1999. In April, this capability was implemented for the BA South region only and North capability was left as a question mark. Subsequently, North capability was scheduled for December, 1999. The December 1999 meeting saw this CR dropped from the December schedule and moved to January 2000. It was finally implemented on January 15, 2000.

CR821 DL Error Codes: As of the December 99 meeting, this CR was tentative for the Feb. 2000 release. March meeting indicated that it was deferred to 3/1/99.

CR1012 System and Procedures for Processing LIDB Records: At change control meeting in March 2000, this was on the June release list. It has since been dropped and is tentative for October 2000.

CR822 Add USOC Quantity and Rates to Parsed CSR: As of September 3, 1999, this CR was listed as a candidate for 2Q 2000. As of last Change Control meeting (July 2000), it was noted that although the requirements have been completed, this CR will not make the October 2000 release.

CR904 Address Validation and TN Assignment - Direct (Common) Inquiry and Response Transaction: As of 9/3/99, this CR was marked as a candidate for 2Q 2000 release. As of July 2000 Change Control meeting, requirements still had not been completed.

CR738 Provide CFA inquiry transaction in Pre-Order: As of 9/3/99, this CR was listed as a candidate for 2Q 2000 release. As of July change control meeting, it was noted that requirements were not completed and that it would not make the October release. This is in spite of AT&T submitting a similar request on June 12, 1999 with specific proposed business rules for both the inquiry and response. The two CRs were combined into one.

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DTE-ATT 1-10: [Checklist item # 2] Please refer to page 27 of the AT&T Supplemental Comments. Provide documentation showing that BA-MA has canceled AT&T orders and asked AT&T to re-submit orders in order to meet its three-day interval for closing trouble tickets on missing notifiers.

Respondent: William Carmody

REPLY: This statement is incorrect and was made in error. AT&T apologizes for this confusion.

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DTE-ATT 1-12: [Checklist item # 2] Please refer to page 29 of the AT&T Supplemental Comments. Please provide the Massachusetts-specific documentation supporting AT&T's assertion that BA-MA has lost call records for AT&T customers or indicate where in the record this information has been provided.

Respondent: William Carmody

REPLY: AT&T believes that the information provided in answer to request 11.a is sufficient to answer this request.

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DTE-ATT 1-13: [Checklist item # 4] See p. 34 of AT&T's Supplemental Comments: Please answer the following questions regarding the 232 LSRCs AT&T received from BA-MA in May 2000 that contained incorrect information.

(a) Provide the total number of hot cut orders AT&T submitted to BA-MA in May 2000.

(b) Did all 232 LSRCs involve hot cuts?

(c) Provide the PON numbers for the 232 orders and specify what was the incorrect information (i.e., wrong due date, wrong pairs, missing a cable and pair assignment).

(d) Indicate for each of the 232 orders whether AT&T performed a "work-around."

REPLY: (a) AT&T does not track the number of "hot-cut orders" submitted in any given month. In May 2000, there were 655 local service requests ("LSRs"). The number of LSRs, however, are not the number of hot cut orders. A CLEC order into Bell Atlantic for loop(s) for one of its customers may have multiple LSRs, because any change in the order requires a new LSR under Bell Atlantic's operation support systems ("OSSs"). In addition, there is not a direct link between the number of LSRs in a given month and the number of local service request confirmations ("LSRCs"). If an order is changed for any reason before an LSRC is issued, there will not be an LSRC associated with the initial order and the LSRC that does issue should be in response to the change in the order (*i.e.*, the second LSR with respect to that order).

(b) yes

(c) Attached to this response is a spreadsheet that lists each PONs and the incorrect information on the LSRC. The words “Cable Reflects ACTL” means that Bell Atlantic failed to provide the correct cable ID or other assignments as discussed in AT&T’s July 18 Supplemental Comments on pages 34-35.

(d) AT&T’s logs do not necessarily record the type of work around activities that its agents must perform for any particular hot-cut. Generally, when the cable and pair information is missing from the LSRC, AT&T’s agents are required to research this information by accessing Bell Atlantic’s Service Order Inquiry (“SOI”), DCAS, or by placing a phone call to the Bell Atlantic TISOC – all additional steps which place a significant burden on the AT&T provisioning process. The exclusion of this information can also result in delays when trouble shooting customer outages.